

March 22, 2021

The Honorable Ronnie Abrams United States District Judge Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: United States of America v Jeffrey Ecker, 20-cv-10422 (RA)

Dear Judge Abrams,

NYLAG represents Mr. Ecker for the limited purpose of settlement. I write with the consent of plaintiff's counsel, Ilan Stein, to request that the initial pretrial conference scheduled for April 2, 2021 and the deadline to file a joint letter and proposed case management plan by March 26, 2021 (ECF #11) be adjourned sine die. We also respectfully request to file another status report in 30 days, on April 21, 2021. This is the second request for an adjournment.

On February 4, 2021 the undersigned filed a limited notice of appearance on behalf of Mr. Ecker for settlement purposes (ECF #9). Since that time Mr. Stein and I initiated settlement discussions. Plaintiff provided Mr. Ecker an extensive financial form and NYLAG has been working with him to complete it. I expect to provide plaintiff the completed form today. Once that is done, plaintiff will review it and will likely have follow-up requests. Given each party's intention to pursue an amicable resolution and NYLAG's limited scope settlement representation, we would like the opportunity to focus our attention on settlement before also commencing pre-trial matters. Adjourning the pre-trial conference and deadline to file a joint proposed management plan along with requiring another status report in 30 days will give the parties that capability and is in the interest of judicial economy.

Respectfully submitted,

Susanne Toes Keane

Application granted. The parties shall submit another status report no later than April 23, 2021. SO ORDERED.

Ronnie Abrams, U.S.D.J.

March 23, 2021